

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,
as representative of

THE COMMONWEALTH OF PUERTO RICO, et al.,
Debtors¹

PROMESA
TITLE III
Case No. 17-BK-3283

(LTS)

**CERTIFICATE OF NO OBJECTION REGARDING THE URGENT MOTION FOR
ALLOWANCE OF ADMINISTRATIVE EXPENSE PURSUANT TO § 503(b) (1) (A) (i)
AND (ii) OF THE BANKRUPTCY CODE FILED BY JUDGMENT CREDITORS OF
THE LITIGATION CAPTIONED NILDA AGOSTO MALDONADO ET. ALS.
CASE NO. K PE 2005-0608**

To the Honorable United States District Court Judge Laura Taylor Swain:

NOW COMES AGOSTO MALDONADO, NILDA A. (CLAIM No. 9421); ALAMO, ANA E. (CLAIM No. 9121); CALO BIRRIEL, MILAGROS (CLAIM No. 9253); CASTRO RODRIGUEZ, ELIZABETH (CLAIM No. 9657); CLAUDIO ROSADO, EDUARDO (CLAIM No. 10163); CUEVAS GONZALEZ, ROBERT (CLAIM No. 10176); CHICO AVILES, LYDIA (CLAIM No. 10061); FEBO COLON, LAURA E. (CLAIM No. 9626); FIGUEROA CRUZ, IRIS M. (CLAIM No. 10194); GONZALEZ DIAZ, RUTH Z. (CLAIM No. 10175); NIEVES VARGAS, MILTON (CLAIM No. 9309); NUÑEZ CORDOVA, JUANITA (CLAIM No. 9645); PIZARRO QUIÑONES, YOLANDA (CLAIM

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

No. 82818); RIOS CALZADA, WANDA T. (CLAIM No. 17058); RIVERA AYALA, MARIA I. (CLAIM No. 9306); RODRIGUEZ DE JESUS, ESTHER (CLAIM No.#10178); ROMERO ROMERO, MAGDALENA (CLAIM No. 10022); SOTO MARQUEZ, ANELISA (CLAIM No. 9184); VAELLO BERMUDEZ, YADIRA (CLAIM No. 9451); VALDERRAMA RODRIGUEZ, CARMEN M. (CLAIM No. 3093), AND THAT ARE ACTIVE EMPLOYEES OF ADFAN, BY THEMSELF AND ON BEHALF AND IN REPRESENTATION OF ALL OTHERS SIMILARLY SITUATED CLAIMANTS INCLUDED AS PLAINTIFFS IN THE JUDGMENT ENTERED BY CFI IN THE CASE NILDA AGOSTO MALDONAO ET ALS V FAMILY DEPARTMENT ET ALS, CASE No. K PE 2005-0608², BY AND THROUGH THE UNDERSIGNED ATTORNEY, AND RESPECTFULLY STATE, ALLEGE AND PRAY:

1. On September 28, 2021, the group of creditors included in the litigation caption Nilda Agosto Maldonado et. als. v Family Department et als, Case No. K PE 2005 - 0608 filed an Urgent Motion Requesting Order for Allowance of Administrative Expense Pursuant to section 503 (b)(1)(A) (i) (ii) to Request for immediate Payment of accrued backpay, pursuant to § 503(b)(1)(A) (i) and (ii) of the Federal Rules of Bankruptcy Code [Case No. 17-03283-LTS, ECF No. 18277] (the "Motion").

2. Objections to the Motion were to be filed and served no later than October 13, 2021 at 4:00 p.m. (AST) (the "Objection Deadline"). According to the Fifteenth Amended Notice, Case Management and Administrative Procedures [ECF No. 17127-1] (the "Case Management Procedures"), the Court may enter an order granting a request for relief without a hearing upon receipt of a certificate of no objection ("CNO", as defined in the

² See Exhibit 2, at pages 16 to 26, for the complete list of plaintiffs included in Nilda Agosto judgment and whom appearing claimants herein seek to represent under FRCP 23, since have similar questions of law and facts. Also see FRBP 2019 (Docket 13534).

Case Management Procedures). See Case Management Procedures, Section III, paragraph P.

3. In accordance with the Case Management Procedures, the undersigned attorney hereby states that we are filing this CNO after the expiration of the Objection Deadline. Also, further certifies that we have reviewed the Court's docket in this case after the Objection Deadline and that no applicable objection, responsive pleading, or request for a hearing with respect to the Motion appears on the docket.

WHEREFORE, the appearing Creditors respectfully requests that the Court enter the proposed order attached hereto as Exhibit A at the Court's earliest convenience.

I HEREBY CERTIFY, in accordance with Fed. R. Bankr. P. 9014(b), Fed. R. Bankr. P. 7004(b), and the Court's Fifteenth Amended Notice, Case Management and Administrative Procedures Order [ECF No. 17127-1] (the "CMP Order"), that we electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all CM/ECF participants in this case. I further certify that, on this same date, I served the foregoing upon all the Standard Parties as identified and defined in the Court's CMP Order, as well as upon all of the parties identified in the Master Service List maintained at <https://cases.primeclerk.com/puertorico/>.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 3rd day of November, 2021.

ATTORNEY FOR THE GROUP WAGE CREDITORS

By: /s/ IVONNE GONZALEZ-MORALES

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